

**BEFORE THE PUBLIC SERVICE COMMISSION OF
THE STATE OF MISSOURI**

In the Matter of Ameren Missouri’s Request)
For Approval of a Revised Net Metering Tariff)
and for Variances from Certain Provisions of) File No. ET-2017-____
4 CSR 240-20.065 Regarding Net Metering.)

**REQUEST FOR VARIANCES
FROM CERTAIN PROVISIONS OF 4 CSR 240-20.065**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company), and for its *Request for Variances from Certain Provisions 4 CSR 240-20.065 (Request for Variances)*, and states as follows:

1. On November 30, 2015, revisions to the Missouri Public Service Commission's (Commission) renewable energy standard and net metering rules became effective, including several revisions to the language contained in the Interconnection Application/Agreement contained within those rules. Concurrent with this Request for Variances, Ameren Missouri is submitting revised Rider SR – Solar Rebate and Net Metering tariffs required by 4 CSR 240-20.065.
2. In order to implement these revised tariffs, the Company is requesting several variances to the language required by 4 CSR 240-20.065, specifically with regard to the language of the Interconnection Application/Agreement. In each case, the purpose of the requested variance is to provide additional clarifying language to reduce customer confusion, expedite processing, or to better reflect steps required to implement net metering for participating Ameren Missouri customers. Attachment A to this pleading contains the tariffs submitted for approval marked in a manner that show the Attachment and the location of each variance. The requested variances are labeled as “Variance Request #1 through #9,” and

correlate to the descriptions of the variances found below, in order to allow the Commission and interested parties to more easily identify the requested variances and the rationale behind them. The requested variances are organized below by their Tariff Sheet locations.

A. Variance Requests found on Multiple Sheets of Revised Tariff.

3. Variance Request #1. The Interconnection Application/Agreement found in 4 CSR 240-20.065 calls for the insertion of the utility name in multiple locations. Ameren Missouri requests that its full utility name be required only the first time in order to identify the utility as Ameren Missouri, and that it be allowed to use “Company” throughout the rest of the contract. This is common drafting practice that, upon a change in the Company’s operational name, allows a single revision rather than multiple revisions to the affected tariff. Additionally, the Company believes customers are benefitted by having a more streamlined document to read. This variance was previously granted in File No. ET-2013-0197, and Ameren Missouri requests that it be approved again in the instant docket.

B. Variance Requests found on Sheet 171.6 of Revised Tariff.

4. Variance Request #2. 4 CSR 240-20.065’s Interconnection Application/Agreement contains a section entitled, “For Customers Who have Received Approval of Customer-Generator System Plans and Specifications,” which is also found in Ameren Missouri's tariffs. The second paragraph of this section, which is found at the top of Sheet No.171.6 of the Company's tariffs, outlines various actions and notifications that a utility takes after the customer has completed installation and is ready for the utility to install the necessary meter to support net metering. In several locations in the paragraph, the rule uses the term “net meter” to refer to the physical meter; Ameren Missouri, however, uses the term “bidirectional meter” with both customers and developers. Using the term “net meter” is likely

to create confusion when discussing installations and billing with customers because: i) the meter itself does not do any netting; ii) net metering, as referred to in other sections of the rule, refers to a billing methodology rather than a physical meter; and iii) in verbal communications, it will not immediately be clear whether “net meter” refers to the physical meter or the billing method. Accordingly, Ameren Missouri requests a variance so that it may use the term “bidirectional meter” for occurrences of the term “net meter,” which refers to the equipment rather than the billing methodology in this section.

5. Variance Request #3. This variance can also be found in 4 CSR 240-20.065’s Interconnection Application/Agreement at the second paragraph of the section entitled, “For Customers Who Have Received Approval of Customer-Generator System Plans and Specifications,” as well as at the top of Company tariff Sheet No.171.6. The paragraph refers to two different inspections, one by the local Authority Having Jurisdiction (AHJ), and one by the utility. In several locations, the term “inspection” refers to the utility’s inspection. Ameren Missouri has revised its tariff to replace “inspection” with “Company’s inspection” in order to differentiate between the two different inspections, with the goal of adding clarity and reducing confusion for customers and developers.

6. Variance Request #4. This variance is found in 4 CSR 240-20.065’s Interconnection Application/Agreement section entitled, “For Customers Who Are Installing Solar Systems,” which appears at the bottom of the Company’s tariff Sheet No. 171.6. This variance is intended to inform customers of information relevant to the solar rebate associated with the Missouri Renewable Energy Standard. In light of the limited availability of solar rebates and complexity of the solar rebate queue established as an outcome of the stipulation and agreement in File No. ET-2014-0085, Ameren Missouri’s revised tariff deletes the

language specified by the rule and replaces it with language it believes more appropriate.

Specifically, the Company's revised tariff strikes this language:

Customer-Generators who are Missouri electric utility retail account holders will receive a solar rebate, if available, based on the capacity stated in the application, or the installed capacity of the Customer-Generator System if it is lower, if the following requirements are met:

- a. The [Utility Name] must have confirmed the Customer-Generator's System is operational; and
- b. Sections H and I of this Application must be completed.

The amount of the rebate will be based on the system capacity measured in direct current. The rebate will be based on the schedule below up to a maximum of 25,000 watts (25kW).

And replace it with:

Ameren Missouri solar rebate funds are no longer available for new applicants. However, if you submitted an application in December 2013, you are in the rebate commitment queue. Please refer to Company's Rider SR – Solar Rebate tariff for the applicable rebate rate and additional details and requirements. For those eligible, the rebate is limited to 25,000 watts (25 kW) and the rebate rate will be based on the following schedule:"

C. Variance Requests found on Sheet 171.8 of Revised Tariff.

7. Variance Request #5. The Company's next request for a variance relates to 4 CSR 240-20.065's Interconnection Application/Agreement at Section B, "Customer-Generator's System Information." 4 CSR 240-20.065 requires:

Certify that the disconnect switch will be located adjacent to the Customer-Generator's electric service meter or explain where and why an alternative location of disconnect switch is being requested...

Ameren Missouri proposes instead to require the following information from applicants:

Describe the location of the disconnect switch...

If disconnect switch is greater than 10 feet from electric service meter, describe why an alternate location is being requested...

The Company has an existing variance, approved in File No. ET-2013-0197, which allows the same variance as requested here. Ameren Missouri feels that its language adds clarity for its customers and reduces the number of occasions when additional communication between the applicant and Ameren Missouri are required. Ameren Missouri accordingly believes it is appropriate to continue using this revised language.

D. Variance Requests found on Sheet 171.9 of Revised Tariff.

8. Variance Request #6. 4 CSR 240-20.065's Interconnection Application/Agreement, at Section C, requires the application to designate the "Person or Agency Who Will Inspect/Certify Installation..." The Company, however, requests that this portion of the application be deleted. This language is no longer necessary, given that the most recent version of 4 CSR 240-20.065 now includes the local AHJ. Ameren Missouri previously requested, and was granted, this variance in File No. ET-2013-0197, and because the circumstances justifying this variance still exists, Ameren Missouri requests it again be approved.

E. Variance Requests found on Sheet 171.11 of Revised Tariff.

9. Variance Request #7a or #7b. The "Net Metering & Easy Connection Act" (386.890 RSMo) states in subsection 3 that electric suppliers shall:

...(2) Offer to the customer-generator a tariff or contract that is identical in electrical energy rates, rate structure, and monthly charges to the contract or tariff that the customer would be assigned if the customer were not an eligible customer-generator...

4 CSR 240-20.065's Interconnection Application/Agreement at Section D.5. currently provides, among other things, that, "...The Customer-Generator shall be responsible for all

other bill components charged to similarly situated customers.” Ameren Missouri believes that one of two variances should be granted with regard to this language:

- a) The Company’s preferred variance adds the phrase “that are not Customer-Generators” to the end of that sentence to more clearly show consistency with the statutory language and help avoid any potential confusion, resulting in a sentence that reads, “The Customer-Generator shall be responsible for all other bill components charged to similarly situated customers that are not Customer-Generators.”
- b) If the Commission determines that this variance is unnecessary, then Ameren Missouri requests that the Commission again grant a variance previously approved in File No. ET-2013-0197, which modifies Section D.5) Energy Pricing and Billing by replacing “customer charges” with “minimum bill,” which more closely reflects the statute for customers that are on rates which include minimum monthly demand charges.

F. Variance Request found on Sheet 171.13 of Revised Tariff.

10. Variance Request #8. The Stipulation and Agreement approved in File No. ER-2016-0179 contains a requirement that Ameren Missouri include the following language in its tariffed net metering Interconnection Application/Agreement:

Customer electricity rates, charges and service fees determined by the Missouri Public Service Commission are subject to change. Future rate adjustments may positively or negatively impact financial savings projected from your generation investment. Ameren Missouri makes no guarantees regarding savings based on future electricity rate projections, including those formulated by third parties.

Ameren Missouri requests a variance from 4 CSR 240-20.065’s standard Interconnection Application/Agreement so that it may include this language as a new section D.10. “Future Rates.”

G. Variance Request found on Sheet 171.17 of Revised Tariff.

11. Variance Request #9. 4 CSR 240-20.065's Interconnection Application/Agreement, at Section I. "Solar Rebate Declaration," requires a customer to make certain certifications about the subject solar installation and their understanding of the rebate program, once the installation is complete, in order to receive a solar rebate. Ameren Missouri believes that the language found in the rule can be deleted and that a new sentence can be added at a later point in the certification. Specifically, the Company proposes that the following sentence can be deleted:

I understand the Company may, through its tariff, require applications for solar rebates be submitted up to one hundred eighty-two (182) days prior to the applicable June 30 operational date for the solar rebate.

Instead, after the listing of the potential rebate amounts, the Company proposes to add the following sentence:

Additional details and requirements regarding the solar rebate can be found in Company's Rider SR – Solar Rebate at www.ameren.com.

Ameren Missouri feels directing the customer to the tariff that the applicable rules governing solar rebates will be beneficial to customers.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission approve the tariffs as filed concurrently with this pleading, and approve the requested variances of certain portions of 4 CSR 240-020.065 as outlined above.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a
Ameren Missouri

/s/ Paula N. Johnson

Paula N. Johnson, #68963
Senior Corporate Counsel
Ameren Missouri
P.O. Box 66149, MC 1310
1901 Chouteau Avenue
St. Louis, MO 63166-6149
(314) 554-3533 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 13th day of March, 2017, to Staff General Counsel and the Office of the Public Counsel.

/s/ Paula N. Johnson